

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JENI RIEGER, ALOHA DAVIS, JODIE
CHAPMAN, CARRIE VASSEL, KAREN
BURNAUGH, TOM GARDEN, ADA AND
ANGELI GOZON, HERNAN A. GONZALEZ,
PATRICIA A. HENSLEY, CLYDIENE
FRANCIS, PETER and GUNNEL LOWEGARD,
and GRANT BRADLEY, individually and on
behalf of a class of similarly situated individuals,

Plaintiffs,

vs.

VOLKSWAGEN GROUP OF AMERICA, INC., a
New Jersey corporation, d/b/a AUDI OF
AMERICA, INC., AUDI AG, a German
corporation, and VOLKSWAGEN AG, a German
corporation,

Defendants.

Case No. 1:21-cv-10546 (NLH)(MJS)

**DECLARATION OF
FRANK J. PRITZL**

I, Frank J. Pritzl, declare, under penalty of perjury, as follows:

1. I am Senior Manager, Product Analysis Group for Volkswagen Group of America, Inc. ("VWGoA"). I make this declaration upon personal knowledge and in support of VWGoA's Motion to Dismiss Plaintiffs' Consolidated Class Action Complaint.

2. I am familiar with records maintained by VWGoA in the regular course of business relating to Audi vehicles distributed by VWGoA, such as the vehicles

owned by the Plaintiffs in this action. I am also familiar with the USA Warranty & Maintenance booklets that accompanied the original sale of the Plaintiffs' Audi vehicles. These booklets, set forth below, include the written New Vehicle Limited Warranty ("NVLW") applicable to the Plaintiffs' vehicles.

3. VWGoA's vehicle records confirm that Plaintiff Clydiene Francis' 2012 Audi A4 was sold and delivered by Audi Meadowlands to that vehicle's first purchaser on March 31, 2012.

4. VWGoA's vehicle records confirm that Plaintiff Carrie Vassel's 2012 Audi Q5 was sold and delivered by Audi Orland Park to that vehicle's first purchaser on August 11, 2011.

5. Attached as Exhibit A is a true and correct copy of the USA Warranty & Maintenance booklet (including the NVLW) applicable to model year 2012 Audi vehicles, including the 2012 Audi Q5 of Plaintiff Carrie Vassel, 2012 Audi A4 of Plaintiff Karen Burnaugh, 2012 Audi A4 of Plaintiff Clydiene Francis, and 2012 Audi A4 Avant of Plaintiff Grant Bradley.

6. Attached as Exhibit B is a true and correct copy of the USA Warranty & Maintenance booklet (including the NVLW) applicable to model year 2013 Audi vehicles, including the 2013 Audi A4 of Plaintiffs Ada and Angeli Gozon, and the 2013 Audi Q5 of Plaintiff Peter Lowegard.

7. Attached as Exhibit C is a true and correct copy of the USA Warranty & Maintenance booklet (including the NVLW) applicable to model year 2014 Audi vehicles, including the 2014 Audi Q5 vehicle of Plaintiff Tom Garden.

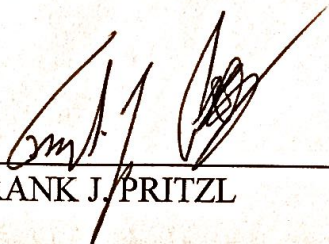
8. Attached as Exhibit D is a true and correct copy of the USA Warranty & Maintenance booklet (including the NVLW) applicable to model year 2015 Audi vehicles, including the 2015 Audi A4 of Plaintiff Jeni Rieger, 2015 Audi Q5 of Plaintiff Hernan Gonzalez, and 2015 Audi A3 Cabriolet of Plaintiff Patricia Hensley.

9. Attached as Exhibit E is a true and correct copy of the USA Warranty & Maintenance booklet (including the NVLW) applicable to model year 2017 Audi vehicles, including the 2017 Audi A4 of Plaintiff Aloha Davis, and the 2017 Audi Q3 of Plaintiff Jodie Chapman.

10. Attached as Exhibit F is a true and correct copy of the July 7, 2013 Retail Purchase Agreement for the purchase, by Plaintiff Peter Lowegard, of his 2013 Audi Q5 vehicle from Audi Plano, an independent authorized Audi dealership located in Plano, Texas. To protect personal information, Mr. Lowegard's address information has been redacted. This Retail Purchase Agreement was received from Audi Plano, the dealership that sold this vehicle to Mr. Lowegard.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 2nd day of December, 2021.



FRANK J. PRITZL